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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

NOV. 2 1990

Mr. Karl Kalbacher
State of Delaware
DNREC
Division of Air and Waste Management
715 Grantham Lane
New Castle, Delaware 19720-4801

Re: Proposed Action Items for Additional Work at Standard
Chlorine Prepared by Responsible Party

Dear Mr. Kalbacher:

EPA has completed our review of the Proposed Action Plan dated October 26, 1990. We have some concerns over potential acceptance of the actions. However, EPA feels that a conditional acceptance can be negotiated. The following are those conditions.

Specifically, these actions shall in no way preclude EPA from requiring additional work to be performed, if necessary, at the site after review of any data submitted. A detailed work plan must be submitted by the RP's describing work to be performed to be reviewed by EPA. Additional sampling procedures can refer back to the original QAPP. It is not necessary to duplicate effort. This additional work shall not delay or extend the current RI/FS work schedule. It is understood by EPA that the actions proposed by the RP's are interim or temporary measures and do not constitute a Remedial Design/ Remedial Action.

EPA also recommends additional sampling be performed in the following areas. Soil sampling east of the eastern spill pathway. Resampling of the 1986 spill pathway soil samples where analytical is suspect (example: eastern drainage ditch). In addition it may be of some value to take deeper soil samples at some of the previous sampling locations. These locations were discussed at our meeting on November 1, 1990.

EPA realizes that these recommendations for additional sampling and resampling usually occur with the review of the Draft Remedial Investigation. However, it may be advantageous for the RP's to address these concerns presently while their contractors are out in the field. These recommendations

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shall not waive the right for EPA to require additional sampling after review of the draft Remedial Investigation or at any stage of the project.

If you should have any questions regarding the above matter, please feel free to contact me at 215-597-3164.

Sincerely,

Robert Guarni
Remedial Project Manager
DE/MD section

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